

271

NO0236.000271
ALAMEDA POINT
SSIC NO. 5090.3

**RESPONSE TO COMMENTS
DRAFT SITE-SPECIFIC HEALTH AND SAFETY PLAN
FOR ORDNANCE EXPLOSIVE, GEOTECHNICAL
AND SEISMIC CHARACTERIZATION
ALAMEDA POINT
ALAMEDA, CALIFORNIA**

DCN: FWSD-RACII-02-0017

Comments by:
Jan Corbett (Code 071)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway, Building 127, Room 112
San Diego, CA 92132-5700

Comments: April 17, 2001

Responses by:
Foster Wheeler Environmental Corporation
1940 E. Deere Avenue, Suite 200
Santa Ana, CA 92705

Response: October 18, 2001

General Comments on Draft Site-Specific Health and Safety Plan

Comment 1. The Health and Safety Plan addresses the major requirements of references (a) and (c) when used in conjunction with the Foster Wheeler Environmental Corporation (FWENC) Base-Wide Health and Safety Plan for Alameda Point.

Response 1. Comment noted.

Comment 2. Recommend the plan be reviewed by trained UXO staff at the activity if available.

Response 2. Comment noted. The plan has been reviewed by a trained UXO staff person and will be further reviewed by UXO personnel assigned to the site.

Specific Comments on Draft Site-Specific Health and Safety Plan

Comment 1. Cover Page must be signed in the final plan.

Response 1. Comment noted. The Cover Page will be signed in the final plan.

Comment 2. Page 2-1, Section 2.0: Please identify the UXO Superintendent and Specialist.

Response 2. The UXO Superintendent/Senior UXO Specialist has been identified in the List of Points of Contact.

Comment 3. Page 12-1, Section 12.0: Please ensure that the evacuation routes are identified in the final plan.

Response 3. Figure 3 in the Final Health and Safety Plan will identify the evacuation routes for the site.

**RESPONSE TO COMMENTS
DRAFT SITE-SPECIFIC HEALTH AND SAFETY PLAN
FOR ORDNANCE EXPLOSIVE, GEOTECHNICAL
AND SEISMIC CHARACTERIZATION
ALAMEDA POINT
ALAMEDA, CALIFORNIA**

DCN: FWSD-RACII-02-0017

Comments by:
Remedial Action Board (RAB)

Responses by:
Foster Wheeler Environmental Corporation
1940 E. Deere Avenue, Suite 200
Santa Ana, CA 92705

Comments: October 12, 2001

Response: October 18, 2001

General Comments on Draft Site-Specific Health and Safety Plan

Comment 1: This Health and Safety (H&S) Plan covers both IR Sites 1 and 2. The main deficiency of the H & S plan is its failure to identify vinyl chloride as a chemical of concern. No Material Safety Data Sheet is included in Attachment 1 for vinyl chloride. Also, the selection of personal protective equipment (PPE) in Table 2 does not seem to take into account the possible presence of vinyl chloride during cone penetrometer tests, drilling, and test excavation. It would appear prudent to provide self-contained breathing apparatus until monitoring has shown the concentrations to be below the PEL's (1 ppm for vinyl chloride). Solvents were disposed of into both IR Sites 1 and 2. Vinyl chloride is present as a degradation product of trichloroethylene (see RAB minutes of August 7, 2001, page 5 of 6). Vinyl chloride is a Group A known human carcinogen. No chemical analyses are planned for the focused RI of Site (see Executive Summary of the focused Work Plan, page iii). Laboratory personnel examining core samples and conducting geotechnical tests could be at risk unless apprised of the potential chemical hazard.

Response 1: Comments noted. Vinyl chloride is not identified as a COC in the soil and groundwater investigations reports for Site 1. FWENC has collected breathing zone samples from workers performing tasks similar to those planned for Site 1. Those analytical results have never shown an exposure approaching or exceeding the PEL for vinyl chloride. At Site 1, the highest concentration of vinyl chloride detected in the first water bearing zone since 11/97 was 69 µg/L. According to *OU3 Final Remedial Investigation Report*, August 1999, the total risk and hazard posed to occupational or recreational receptors from potential exposure through inhalation of VOCs migrating from the first water bearing zone into the ambient air was reported to be less than 1E-06 and less than a hazard index of 1, respectively. Therefore, we do not anticipate that vinyl chloride exposure will be of concern. However, we will perform breathing zone sampling and analyses using a AIHA accredited laboratory. The number and frequency of the sampling will be determined by the CIH once intrusive work has commenced. Table 1 has been amended to include vinyl chloride and a MSDS for vinyl chloride has been included.

**RESPONSE TO COMMENTS
DRAFT SITE-SPECIFIC HEALTH AND SAFETY PLAN
FOR ORDNANCE EXPLOSIVE, GEOTECHNICAL
AND SEISMIC CHARACTERIZATION
ALAMEDA POINT
ALAMEDA, CALIFORNIA**

DCN: FWSD-RACII-02-0017

Specific Comments on Draft Site-Specific Health and Safety Plan

Comment 1: Page 1-1, Section 1.3 refers to the “artillery rane”. Shouldn’t this be “pistol range”?

Response 1: Comment noted. The range mentioned should have been the pistol range. The text will be amended to reference the correct range.

Comment 2: Page 4-1, Section 4.5.1, “Environmental Hazards”, first paragraph discusses snakes taking from the “desert heat”. Perhaps this section was adapted from another site location.

Response 2: Comment noted. It does appear that this sentence was adapted from another H&S plan. The final sentence in this paragraph will be deleted.

Comment 3: Page 4-5, Section 4.5.1, “Recommended Safe Work Practices for Range Residue Removal”, states that the use of cellular phones and radios will be controlled within Sites 1 and 2. If buried UXO is present in either IR Site 1 or 2, wouldn’t there be a risk to future site users such as golfers, course maintenance workers or other members of the public from detonation initiated by cell phones, cell phone relay stations, keyless car entry devices, etc.

Response 3: Comment noted. Upon completion of planned activities for both sites, a 4-foot topsoil cap will be placed on Site 1 and a 1-3 foot layer of landscaping soil placed atop that. This depth of the topsoil will prevent the initiation of any buried UXO, if any exists there. Similarly, a 2-foot landfill cap is planned for Site 2 and this will shield any buried UXO (if it is present) from RF transmissions.

Comment 4: Attachment 2, “Activity Hazard Analysis”, does not appear to cover Bathymetric Surveys, however, “Sample Retrieval and Handling” page 3 of 3 covers some of these activities.

Response 4: Comment noted. Although not specifically addressed, the primary hazards related with completing the bathymetric survey mainly concern hazards and controls associated with boating activities. These can be found in Hazard Analysis #2 under the Principal Steps of Handling Core Samples and Drilling or Punch for Samples (including off-shore drilling).

Comment 5: Figure 3, it would be helpful if the map showed the route to the Alameda Hospital, rather than having the address in a box. Also, shouldn’t the Concentra Medical Center be identified as a clinic?

Response 5: The route to Alameda Hospital will be shown in Figure 3 and Concentra Medical Center will be identified as a clinic.

**RESPONSE TO COMMENTS
DRAFT SITE-SPECIFIC HEALTH AND SAFETY PLAN
FOR ORDNANCE EXPLOSIVE, GEOTECHNICAL
AND SEISMIC CHARACTERIZATION
ALAMEDA POINT
ALAMEDA, CALIFORNIA**

DCN: FWSD-RACII-02-0017

Comment 6: Abbreviations and acronyms, pages iv and v, many are missing such as PEL, TLV, STEL, CNS, PFD, AEDA, and ESQD. Also under "PID" the end of the definition "Project Manager (PjM)" appears to belong on the next line.

Response 6: Comment noted. The abbreviations will be added to the list.

Comment 7: Table 1, "Chemical Hazards Assessment" page 1 of 2, under "Benzene" it should read "severe exposure" not "sever exposure".

Response 7: Comment noted. The table will be amended to reflect the correction.

FOSTER WHEELER

FOSTER WHEELER ENVIRONMENTAL CORPORATION

TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N44255-95-D-6030 (RAC II)

Document Control No. 02-0017 Rev. 0

File Code: 5.0

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Lovering, 02R1.RL
1220 Pacific Highway
San Diego, CA 92132-5190

DATE: 10/26/01
DO: 0095
LOCATION: NAS Alameda

FROM:


Neil Hart, Program Manager

DESCRIPTION: Response to Comments, Draft Site-Specific Health and Safety Plan for
Ordnance Explosive, Geotechnical and Seismic Characterization, Rev. 0, Not Dated

TYPE: ☐ Contract/Deliverable ☒ DO Deliverable ☐ Notification
☐ Other

VERSION: Final REVISION #: 0
(e.g. Draft, Draft Final, Final, etc.)

ADMIN RECORD: Yes ☒ No ☐ Category ☐ Confidential ☐
(PM to Identify)

SCHEDULED DELIVERY DATE: 10/18/01 ACTUAL DELIVERY DATE: 10/26/01

NUMBER OF COPIES SUBMITTED: O/5C/9E

COPIES TO: (Include Name, Navy Mail Code, and Number of Copies)

NAVY:

R. Weissenborn (06CARW)

O/5E

J. Corbett (3ENJC) 1C/1E

D. Silva (05GDS) 3C/3E

Basic Contract File (02R1)

1C

FWENC:

R. Margotto

M. Schneider

A. Loan

L. Humphrey

T. Vaughns-Rachal

OTHER: (Distributed by FWENC)

See Attached for Additional
Distribution

Date/Time Received